

REMARKS

Claims 1 – 15 are pending in the present application.

In an Office Action dated 6 April 2005, the Examiner rejected claims 1 – 15 under 35 U.S.C. 102(e) as being clearly anticipated by United States Patent No. 6,490,274 issued to Kim, noting with respect thereto:

Regarding claims 1, 6, and 11, Kim teaches a method and system for internet (254) cable phone (208, packet based terminal device) telephony service over internet protocol (IP) (addressing system) for enabling a calling party using a public switched telephone network (PSTN, 260) phone (256, circuit based terminal device), which is addressable via a telephone number, to initiate a communication connection to a called party who is using an IP addressable cable phone (208, a packet-based terminal device, which is addressable via an IP address) (See Fig. 2) comprising

directory information base (DIB, 218 as data storage means), for storing data in as a memory indicative of a correspondence between at least one IP address assigned to a 1st cable phone (208, said called party's packet-based terminal device) and a corresponding PSTN telephone number assigned to 1st cable phone (208, said called party's circuit-based terminal device),

1st head end unit (202 as terminal device location means), responsive to receipt of data from said calling party indicative of said called party's telephone numbers corresponding to 1st cable phone (208, said called party's circuit-based terminal device), for retrieving data from DIB (218, said memory indicative of said IP address) assigned to a 1st cable phone (208, called party's packet-based terminal device), and

1st router (216 as communication connection means), for establishing a communication connection between 1st PSTN phone (256, said calling party's circuit-based terminal device) to 1st cable phone (208, said called party's packet-based terminal device) (See Fig. 2, Col. 3, lines 53-67).

Applicant has reviewed the cited Kim reference and the Examiner's clearly stated grounds for rejection, and has added claims 16 – 18, amended independent claims 1, 6, and 11, and presents the following arguments in support of patentability of claims 1 – 18.

The Kim Patent discloses a telephony service system that includes:

a directory unit, a plurality of network segment units, each including a head-end unit, and a plurality of routers respectively formed in each network segment unit. The directory unit stores the IP address corresponding to a telephone number of a first cable phone. The plurality of network segment units, each having a head-end unit, read IP addresses stored in the directory unit based on a received telephone number of a second cable phone, and determine a connection audio session using an Internet protocol from the

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read IP address to set a call path with the first cable phone. The plurality of routers set a call path between the network segment units. According to the cable network of a packet type, unlike a PSTN network of a switch network, the local call charge is reduced. A wide bandwidth of the cable suppresses deterioration in quality of audio service of the cable network, which may be caused by compression or delay in the PSTN network. (Abstract)

The first and second network segment units 200 and 240 of FIG. 2 are formed in a tree type network using hubs 204, 205, 244, . . . , and it is assumed that each of the cable phones is an Ethernet phone including an Internet protocol, capable of receiving an audio signal of the Internet.

A user inputs the telephone number of a receiver to the first or second PSTN phone 256 or 258 (step 400). One of the first through fourth cable phones 208, 214, 246 and 248 is the receivers. The PSTN 260 is connected to the first and second ITGs 220 and 262 through the T1/T2/T3/E1 network (step 402). If the PSTN 260 is connected to the first and second ITGs 220 and 262, the routers 216 and 250 set a call path between the ITGs 220 and 262 and the first and second headend units 202 and 242. If the call path is set, the first and second headend units 202 and 242 check the first and second DIBs 218 and 264 (step 404), and thus it is determined whether there is an IP address corresponding to the telephone number input from the first or second PSTN phone 256 or 258 (step 406). If it is determined in step 406 that there is an IP address, peer-to-peer IP telephony is set between the first and second PSTN phone 256 or 258 and one of the first through fourth cable phones 208, 214, 246 or 248 (step 408) to connect the call (step 410).

In contrast, Applicant's system for interconnecting circuit-based terminal devices with packet-based terminal devices in a voice communication connection (packet-based terminal device addressing system) provides service capabilities that allow a calling party to address packet-based terminal devices without consuming telephone numbers. In this case, the calling party, using a circuit-based terminal device such as a traditional telephone or video telephone, initiates a call to a called party, using the called party's telephone number. The packet-based terminal device addressing system presumes that the owner of the packet-based terminal device also owns a circuit-based terminal device and therefore reuses the point of presence address of the circuit-based terminal device (telephone number) for the packet-based terminal device. The packet-based terminal device addressing system employs the use of a plurality of existing systems, such as VXML, ASR, residential gateways, and directory services, to locate and connect to the called party's

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packet-based terminal device.

Summary

Applicant respectfully requests a Notice of Allowance of claims 1 – 18 in this application in light of the remarks set forth herein. The undersigned attorney requests Examiner Chang to telephone if a conversation could expedite the prosecution of this application. Applicant authorizes the Commissioner to charge any required payment of fees to Deposit Account No. 50-1848.

Respectfully submitted,
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